BART-Rule

Public Comments Discussions

Clean Air Act Task Force
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Overview of Comments

- CAIR as BART-substitute
- Emission rates used for CALPUFF modeling
- Facility-wide Trading (averaging) for SO2
- Others comments (no discussions required)

CAIR as BART -substitute

- CAIR applies to 28 eastern states and includes all EGUs in those states (over 600,000 MW)

- BART applies nationwide and includes a subset of EGUs (over 200,000 MW)

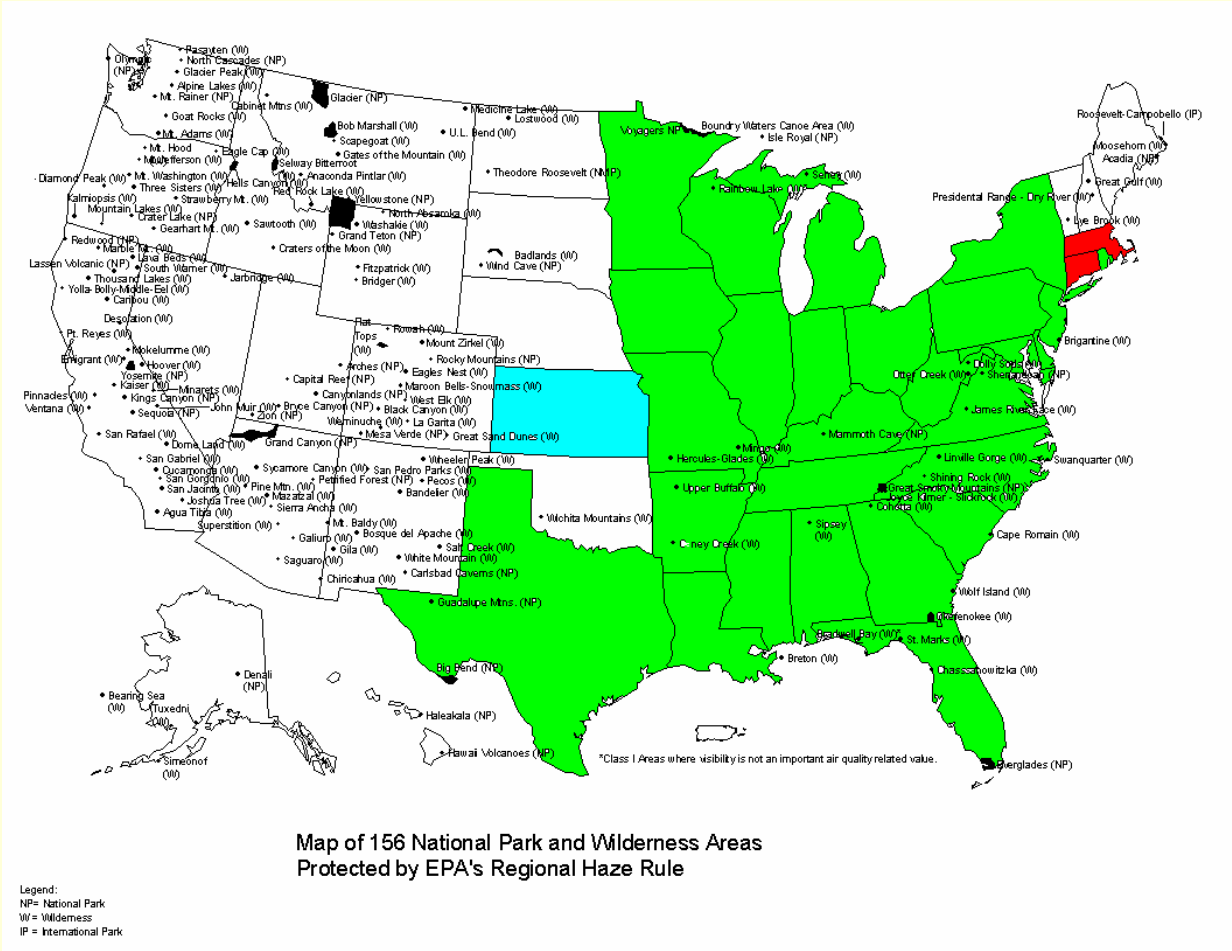
- EPA Criteria for CAIR being better than BART:

Two-pronged visibility test:

1- Visibility does not decline in any Class I areas

2- There is an overall improvement in visibility, determined by comparing the average differences over all affected Class I area.

EPA modeled CAIR-states



Map of 156 National Park and Wilderness Areas
Protected by EPA's Regional Haze Rule

Legend:
NP= National Park
W = Wilderness
IP = International Park

EGU emission projection 2015

EPA compared two scenarios :

1- CAIR in CAIR-states+ BART in non-CAIR states

	CAIR	+	BART	=	total
SO2(1000 tons)	4152	+	583	=	4735
NOx(1000 tons)	1289	+	527	=	1816

2- BART nationwide (no CAIR)

SO2(1000 tons)	=	7162
NOx(1000 tons)	=	2454

EGU emission projection 2015 for WI

EPA modeling results for Wisconsin:

1- CAIR as BART substitute in Wisconsin

SO2(1000 tons) = 132

NOx(1000 tons) = 32

2- BART in Wisconsin (no CAIR)

SO2(1000 tons) = 58

NOx(1000 tons) = 47

How to identify sources subject to BART

Available options:

1- Consider all BART-eligible sources as subject to BART

2- Consider exempting sources, which may not reasonably be anticipated to cause or contribute to any visibility impairment in a Class I area

Individual Source Attribution

Using Dispersion Model CALPUFF

Model Input:

- Meteorological data for 3 years, (2002-2004)
- Emission rates for NOx, SO2 and PM
- Other data (see EPA documentations)

(http://www.epa.gov/scram001/dispersion_prefrec.htm#calpuff)

Emission rate for modeling input

- The emission rates used in the model are intended to reflect steady-state operating conditions during periods of high capacity utilization.
- EPA recommends the 24-hour average actual emission rate from the highest emitting day of the meteorological period modeled
- For units without CEMs, EPA suggests the use of potential emissions or existing permit limits.

Emission rate for modeling input, ctd

- The Department used the Potential emissions or existing permit limits.
- Comments suggesting that it should be possible for facilities to provide the maximum 24-hr actual emission rates for the modeling.
- Department proposal:

  The emission rates provided by facilities are acceptable if the rates can be included in the operating permit.

Emission rate for modeling input, ctd

Our reasons for the proposal:

- The proposal give facilities more flexibility
- An emission rate included in the permit best approximates the rate during periods of high capacity utilization.
- The data are more likely to be accurate.
- The approach is consistent with the requirement that BART emission limits must be included as title V permit condition.

Facility-wide trading or averaging

- EPA recommendation:

Averaging across any set of BART-eligible sources within a fence line.

- Department proposal
  - Trading (or averaging) between all boilers within a facility for NOx and SO2
  - Monitoring requirements: 40 CFR part 64

Other comments

- One facility identified one of its sources as a possible BART-eligible source
- Follow EPA guidelines
- Make modeling protocol and data for CALPUFF available
- Provide information on the proposal for meeting reasonable progress
- Supporting comments